

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LESLIE DICK WORLDWIDE, LTD. and  
LESLIE DICK,

Plaintiffs,

- v -

GEORGE SOROS, ET AL.,

Defendants.

No. 08 CV 7900 (BSJ) (THK)

ECF Case

**DEFENDANTS CONSECO, INC., CARMEL FIFTH LLC, AND  
KIRKLAND & ELLIS LLP'S NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Consecro, Inc., Carmel Fifth LLC, and Kirkland & Ellis LLP's Motion to Dismiss, any other applicable papers filed by other defendants in support of their motions to dismiss, and all other papers and proceedings in this action Defendants Consecro, Inc., Carmel Fifth LLC, and Kirkland & Ellis LLP, by and through their attorneys, will move this Court, pursuant to Rule 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, before the Honorable Barbara S. Jones, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a time and place to be determined by the Court, for an Order dismissing Plaintiffs' Complaint in its entirety, and for such further and other relief that the Court may deem just and proper.

Dated: December 22, 2008

Respectfully submitted,

/s/ S. Maja Fabula

Reed S. Oslan, P.C. (admitted *pro hac vice*)  
S. Maja Fabula (SF-0240)  
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Counsel for Defendants Conseco, Inc., Carmel  
Fifth, LLC, and Kirkland & Ellis LLP

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of December 2008, a true and correct copy of Defendants' Consecro, Inc, Carmel Fifth, LLC and Kirkland & Ellis LLP's Motion to Dismiss, their Memorandum in Support, and the Declaration of S. Maja Fabula and its accompanying exhibit, was served to all counsel of record who have registered to receive Notice of Electronic Filing via the Court's ECF system.

/s/ Sandra Maja Fabula  
Sandra Maja Fabula (SF-0240)